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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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OFFICE OF THE SECRETARY

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| In the Matter of |) | |
| |) | |
| Revision of the Commission's Rules |) | CC Docket No. 94-102 |
| To Ensure Compatibility with |) | RM-8143 |
| Enhanced 911 Emergency |) | |
| Calling Systems |) | |
| |) | |
| Wireless Telecommunications Bureau |) | DA 99-1049 |
| Requests Targeted Comment on |) | |
| Wireless E911 Phase II Automatic |) | |
| Location Identification Requirements |) | |

COMMENTS OF AMERITECH

Ameritech ("Ameritech" or "the Company") respectfully submits these comments in response to the *Public Notice*, DA 99-1049 (*rel.* June 1, 1999) ("*Public Notice*"), in the above-captioned docket. The *Public Notice* requests comment on issues relating to the development of Phase II automatic location identification ("ALI") standards in light of the potential availability of handset-based technologies. In particular, the Wireless Telecommunications Bureau ("Bureau") seeks comment on: (1) whether to adopt standards for handset approaches similar to certain industry proposals¹; (2) how specifically to handle the issues of roaming and handset turnover; and (3) whether the Bureau should clarify or modify its methodology for determining ALI accuracy under Phase II.

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List A B C D E

Ameritech believes that the Bureau should rule on pending requests for waiver of _____ the Phase II ALI requirements independently of its decision whether or not to adopt

¹ See February 25, 1999 Comments of SnapTrack, Inc. ("SnapTrack Proposal"); May 25, 1999 Further Comments of APCO in Response to Requests for Waiver of Phase II Requirements ("APCO Proposal").

Phase II ALI standards for handset technologies, or the substance of such standards, if adopted. The Bureau should not make a carrier's compliance with Section 20.18(e) of the Commission's Rules dependent upon a third party vendor's ability to timely produce or deliver compliant ALI technology.

I. THE BUREAU SHOULD RULE ON CARRIERS' INDIVIDUAL WAIVER REQUESTS INDEPENDENTLY OF ITS DECISION REGARDING PHASE II ALI STANDARDS FOR HANDSET-BASED TECHNOLOGIES

On February 4, 1999, Ameritech filed a request for waiver of Rule Section 20.18(e) because it had not yet determined which technology to use to comply with the Commission's E911 location mandate.² In its request, Ameritech sought a ruling from the Bureau that it would be deemed in compliance with Section 20.18(e) if it:

- 1) works in good faith with manufacturers of location-enabled handsets to create a reasonable phased-in deployment plan prior to deployment of a location-enabled handset solution. Such a plan may include a mix of handset-based and network-based solutions within Ameritech's coverage area;
- 2) utilizes a handset-based solution that meets a two-dimensional location accuracy standard of 90 meters with 67 percent confidence; and
- 3) undertakes an active program to promote awareness of the availability and public safety benefits of location-enabled handsets.³

Ameritech is committed to achieving the goals set forth in Rule Section 20.18(e), either by meeting the specific requirements of the rule or by meeting the standards set forth in its Waiver Request. The Company will set in place a program to provide Public Service Answering Points ("PSAPs") with timely, accurate information on the location of

² See Ameritech's Request for Waiver (filed Feb. 4, 1999) ("Ameritech Waiver Request") at 1.

³ Ameritech Waiver Request at 2.

emergency callers regardless of how it chooses to achieve compliance. However, having the flexibility to choose ALI technology based on the benefits to public safety, performance, and economic factors will be meaningless if the Bureau does not issue a ruling on individual waiver requests, or if it adopts Phase II standards and other guidelines that make a carrier's compliance with Rule Section 20.18(e) dependent on factors outside of the carrier's control. Ruling on the sufficiency of individual waiver requests will provide carriers with the certainty they need to evaluate fully and impartially the performance of various ALI technologies. With these thoughts paramount, Ameritech provides its targeted comment below:

II. STANDARDS FOR HANDSET-BASED SOLUTIONS

In its comments, SnapTrack proposes that the Commission should deem carriers to be in compliance with Rule Section 20.18(e) if they: (1) begin to deploy location-capable handsets by January 1, 2001, (2) deploy only location-capable handsets after December 31, 2001; and (3) achieve location accuracy of 90 meters using circular error probability (CEP) methodology.⁴ Ameritech supports SnapTrack's proposal to the extent that it allows full deployment of location-enabled handsets to be *phased in* by carriers, rather than requiring carriers to affirmatively replace or upgrade non-enabled handsets. If the Commission were to adopt the latter approach, the additional cost to carriers and PSAPs (to the extent that PSAPs reimburse carriers) would likely be so great as to practically eliminate any handset-based alternative from consideration.⁵ Instead,

⁴ SnapTrack Proposal at 4.

⁵ Ameritech estimates that providing location-enabled handsets for only 20 percent of U.S. wireless customers would cost in excess of \$3 billion, some of which may be underwritten by the public safety community itself. Ameritech Waiver Request at 7.

Ameritech supports a “good faith” requirement to work with manufacturers of location-enabled handsets to create a reasonable phase-in deployment plan. Ameritech strongly urges the Bureau to rely upon market forces and carrier promotional efforts to deploy location-enabled handsets.

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) has proposed that carriers be allowed to implement a handset-based solution only if they deploy location-capable handsets according to a specific schedule and meet firm deadlines for achieving specific levels of location-capable handsets among all of their subscribers. In particular, APCO proposes that 25% of all phones in use on a carrier’s system be ALI-capable by December 31, 2002, 50% by December 31, 2003, 75% by December 31, 2004, and 99% by December 31, 2005.⁶ While Ameritech certainly supports the public safety goals of APCO in advocating bright-line deployment levels for ALI-capable phones, the Company believes that any attempt to set mandatory benchmarks would be unwise. As noted above, the additional cost to carriers and PSAPs (to the extent that PSAPs reimburse carriers) of *any* proposal which involves the mandatory replacement of handsets would likely be so great as to practically eliminate any handset-based ALI solution from consideration. Ameritech expects that today’s market forces will continue to prevail into the foreseeable future and that customers will continue to turn over their handsets rapidly. As a result, the concerns voiced by APCO can be expected to be relatively short-lived. As part of its requested waiver or under standards adopted by the Commission, Ameritech would aid the natural operation of the market by actively educating the public and promoting the benefits of location-enabled

⁶ APCO Proposal at 3.

handsets. In sum, the financial and public safety costs associated with overriding normal market forces are not likely to prove worth any marginal gain that might result from such a requirement in the short term.

III. THE BUREAU MAY REQUIRE GREATER ACCURACY OF HANDSET-BASED ALI SOLUTIONS IF IT ALLOWS CARRIERS AND HANDSET MANUFACTURERS TO DEVELOP REASONABLE PHASE-IN SCHEDULES

Ameritech believes the wireless industry can support a more accurate ALI capability standard, if the Bureau allows carriers and handset manufacturers to develop reasonable phase-in plans for location-enabled handsets and to implement upgrades through the operation of market forces. Under the terms of its requested waiver, Ameritech would provide PSAPs with ALI that meets a two-dimensional location accuracy standard of 90 meters with 67 percent confidence on those wireless handsets equipped with the handset-based technology.⁷ This exceeds the accuracy specified by Section 20.18(e) of the Commission's Rules, which requires carriers to meet a standard of only 125 meters root mean square ("RMS"). However, in order for the industry to meet this higher hurdle, it should be allowed to implement compliant handsets through normal attrition, coupled with the educational efforts described above. Indeed, a phased-in approach is needed for both handset and network solutions, since neither can be implemented state-wide on an "all at once" basis. Whether distributing compliant handsets, or implementing a network upgrade for each PSAP, carriers will require a reasonable period of time to accomplish the task.

⁷ Ameritech Waiver Request at 4.

WHEREFORE, good cause being shown, Ameritech respectfully requests that the Bureau rule on pending requests for waiver of the Phase II ALI requirements independently of its decision whether or not to adopt Phase II ALI standards for handset technologies, and otherwise adopt policies and rules consistent with these comments.

Respectfully Submitted,

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